

Hearing Date: September 18, 2013 at 2:00 p.m.

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS, INC., ET AL.,  
  
Debtors.

Chapter 11 Case No.  
08-13555 (JMP)  
Jointly Administered

In re:

LEHMAN BROTHERS, INC.,  
  
Debtor.

Case No.  
08-01420 (JMP) SIPA

FIRSTBANK PUERTO RICO,  
  
Plaintiff,  
  
-against-  
  
BARCLAYS CAPITAL INC.,  
  
Defendant.

Adversary Proc. No.  
10-04103 (JMP)

**SUPPLEMENTAL DECLARATION OF BOAZ S. MORAG IN FURTHER SUPPORT  
OF DEFENDANT BARCLAYS CAPITAL INC.'S MOTION FOR CIVIL  
CONTEMPT SANCTIONS AGAINST FIRSTBANK PUERTO RICO  
FOR WILLFUL VIOLATION OF THE SALE ORDER**

I, BOAZ S. MORAG, declare as follows:

1. I am a member of the bar of this Court and Counsel to the law firm of Cleary Gottlieb Steen & Hamilton LLP, attorneys for Barclays Capital Inc. ("Barclays") in the above-captioned proceedings. I respectfully submit this supplemental declaration in further support of Barclays' Motion for Civil Contempt Sanctions Against FirstBank Puerto Rico ("FirstBank") for Willful Violation of the Sale Order (the "Contempt Motion").

2. Citations to Exhibits 97-102 in Barclays' reply memorandum of law in further support of its Contempt Motion refer to the following Exhibits 97-102, true and correct copies of which are attached to this Declaration:

EXHIBIT	DESCRIPTION
97.	Letter from Jeffrey A. Mitchell to Hon. Naomi Reice Buchwald (July 11, 2013)
98.	Letter from Boaz S. Morag to Hon. Naomi Reice Buchwald (July 10, 2013)
99.	First Bancorp. May 10, 2013 Current Report on Form 8-K, filed May 13, 2013
100.	Transcript of Aug. 25, 2010 Hearing before Hon George B. Daniels ("Motion to Refer Hearing")
101.	Excerpt of International Swaps and Derivatives Association, Inc., <u>Guidelines for Collateral Practitioners</u> (1996) <sup>1</sup>
102.	Stipulation & Order, <u>FirstBank Puerto Rico v. Barclays Capital Inc.</u> , Case No. 13-CV-04732 (NRB) (July 24, 2013), ECF No. 5

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 5, 2013  
New York, New York

  
BOAZ S. MORAG

<sup>1</sup> Pursuant to Paragraph II(A)(3) of General Order M-399 of the General Orders of the Bankruptcy Court for the Southern District of New York, Barclays will provide a complete copy of this exhibit upon the Court's request.